

DD/M&S 74-1887

28 MAY 1974

MEMORANDUM FOR: Inspector General

SUBJECT : Proposed Memorandum re Procedures for
Reporting Certain Activities

Don:

1. Reference is made to your request for my opinion on the draft memorandum on "Procedures for Reporting Certain Activities."

2. This is to advise that I could live with the memorandum in its present form, but it is my view that the draft still needs considerable polishing. In this regard, I offer the following comments in an effort to be constructive:

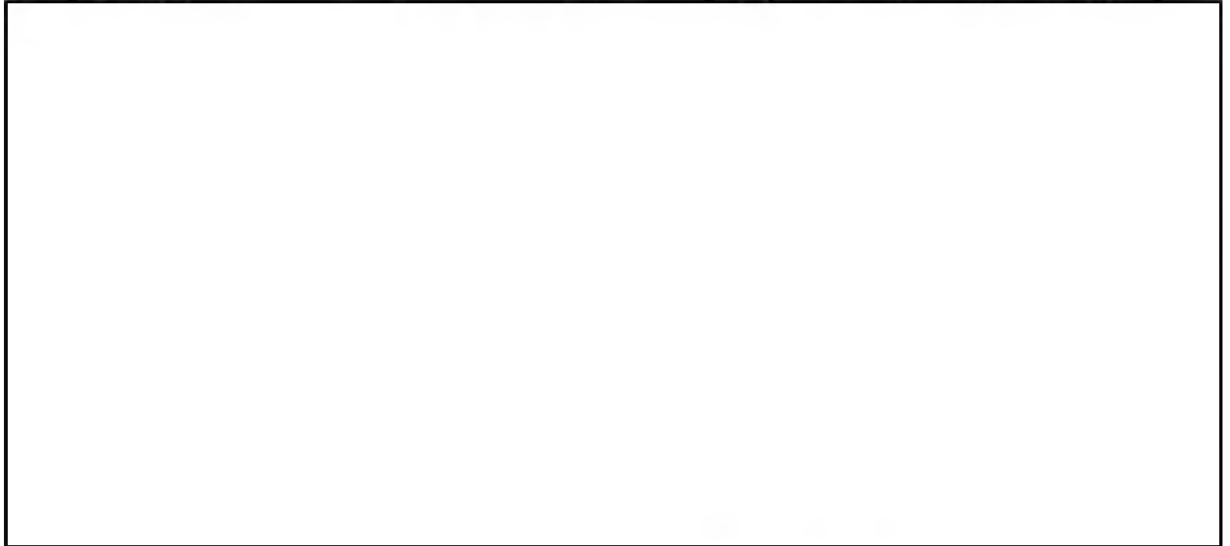
a. Subject The heading is somewhat meaningless and nondescript in referring to "certain activities." One is then immediately misled in focusing on reference (a), and the early paragraphs, which seem to imply that the procedures relate to Agency assistance to other government components. Most of the extensive background material is retained by all four Deputy Directors under the "Questionable Activities" heading, which the DCI used. Possibly you can come up with a better label, but the QA heading gives some insight that we are talking about activities which might be construed as outside the legislative charter of the Agency.



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c. Guidelines There has been a year of confusion over HN [] members of your Office have indicated at various times the procedure did not work well; and your paragraph 2 refers to these "uncertainties" and "questions." It would seem that there is a great need to develop clear crisp guidelines so that the four DD's are applying the instructions in the same general manner. There is a requirement for clarity as to when a DD "feels a need" to submit this category problem to the DCI.

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d. Approval Criteria Presumably the IG will make a "permissibility/propriety" review; OGC checks the legality of the activity; and the DD analyzes it from a "substantive" standpoint. I feel that these distinctions become very artificial, since we are all, in effect, making recommendations to the DCI as to whether the project or activity should be permitted. To cite a recent example, in late March 1974,



3. In summary, I would urge that this draft proposal be substantially reworked into a guidance paper, with strong emphasis on clarity. In its final form, you might wish to consider the pros and cons of issuing this as a notice or regulation.

/s/ John F. Blake

HAROLD L. BROWMAN
Deputy Director
for
Management and Services